

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

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In re:	:	
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THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. <sup>1</sup>	:	
	X	

**INFORMATIVE MOTION OF (I) FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE, AND (II)  
OFFICIAL COMMITTEE OF UNSECURED CREDITORS, PURSUANT TO ORDER  
ESTABLISHING INITIAL PROCEDURES WITH RESPECT TO OMNIBUS  
OBJECTION TO CLAIMS FILED OR ASSERTED BY HOLDERS OF CERTAIN  
COMMONWEALTH GENERAL OBLIGATION BONDS, REGARDING LIST OF  
PARTIES FILING NOTICES OF PARTICIPATION**

To the Honorable United States District Judge Laura Taylor Swain:

The Financial Oversight and Management Board for the Commonwealth of Puerto Rico (the “Commonwealth”), acting through its Special Claims Committee (the “Oversight Board”), and the Official Committee of Unsecured Creditors of all Title III Debtors (the “Committee,” and together with the Oversight Board, the “Objectors”) hereby submit this informative motion pursuant to the Court’s *Order, Pursuant to Bankruptcy Code Section 502 and Bankruptcy Rule*

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474), and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747).

*3007, Establishing Initial Procedures with Respect to Omnibus Objection of (I) Financial Oversight and Management Board, Acting Through Its Special Claims Committee, and (II) Official Committee of Unsecured Creditors, to Claims Filed or Asserted by Holders of Certain Commonwealth General Obligation Bonds and Granting Related Relief* [Docket No. 5143] (the “Initial Procedures Order”),<sup>2</sup> and respectfully state as follows:

1. On February 15, 2019, the Court entered the Initial Procedures Order, which approved and incorporated by reference certain Objection Procedures, attached as Exhibit 2 to the Initial Procedures Order, in connection with the Objectors’ omnibus objection to claims filed or asserted by holders of certain Commonwealth general obligation bonds.<sup>3</sup>

2. The Objection Procedures required, among other things, that parties in interest wishing to participate in the litigation of the Objection serve and file a Notice of Participation by April 16, 2019 (the “Participation Deadline”) indicating, among other things, whether the Participant supports or opposes the Objection, and the name, address, and email address of the Participant and its counsel, if any.<sup>4</sup>

3. In addition, the Objection Procedures provide that, “[o]n the date that is five (5) days after the Participation Deadline, the Objectors shall file with the District Court a list of all parties that filed Notices of Participation, their counsel, and whether such Participants are Joint Objectors or Respondents. Such list will be updated as necessary every thirty (30) days to reflect any late-filed or updated Notices of Participation.”<sup>5</sup>

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<sup>2</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the Initial Procedures Order and the exhibits thereto.

<sup>3</sup> Initial Procedures Order, ¶ 3.

<sup>4</sup> Objection Procedures, at 2.

<sup>5</sup> *Id.* at 4.

4. Pursuant to the Initial Procedures Order and the Objection Procedures, the Objectors hereby file the list of parties that have filed Notices of Participation, along with required related information, attached hereto as **Exhibit A**.

5. In addition, the Objectors wish to inform the Court that due to (a) the fact that a number of Notices of Participation were incomplete, incorrectly filled out, or delivered to the Objectors but not filed on the docket, and (b) the sheer number of *pro se* Participants, the Objection Procedures will likely need to be amended to address a variety of unanticipated issues. The Committee and Oversight Board intend to propose revised procedures to the Court for this purpose in the near future. Among other things, the proposed revised procedures may allow Participants the opportunity to amend or withdraw their Notices of Participation and/or modify the process for developing the Objection Litigation Procedures.<sup>6</sup>

*[Remainder of page intentionally left blank.]*

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<sup>6</sup> A number of Participants returned Notices of Participation that failed to indicate whether they supported or opposed the Objection, and so their status as Respondents or Joint Objectors is currently listed as “Undetermined” on **Exhibit A**.

WHEREFORE, the Objectors respectfully requests that the Court take notice of the above.

Dated: April 22, 2019

/s/ Edward S. Weisfelner

BROWN RUDNICK LLP  
Edward S. Weisfelner, Esq. (*Pro Hac Vice*)  
Angela M. Papalaskaris, Esq. (*Pro Hac Vice*)  
Seven Times Square  
New York, NY 10036  
Tel: (212) 209-4800  
eweisfelner@brownrudnick.com  
apapalaskaris@brownrudnick.com

Stephen A. Best, Esq. (*Pro Hac Vice*)  
601 Thirteenth Street NW, Suite 600  
Washington, D.C. 20005  
sbest@brownrudnick.com

Sunni P. Beville, Esq. (*Pro Hac Vice*)  
One Financial Center  
Boston, MA 02111  
Tel: (617) 856-8200  
sbeville@brownrudnick.com

*Counsel to the Financial Oversight and Management  
Board, acting through the Special Claims Committee*

and

/s/ Alberto Estrella

ESTRELLA, LLC  
Alberto Estrella (USDC-PR 209804)  
Kenneth C. Suria (USDC-PR 213302)  
P. O. Box 9023596  
San Juan, Puerto Rico 00902-3596  
Tel.: (787) 977-5050  
Fax: (787) 977-5090

*Local Counsel to the Financial Oversight and Management  
Board, acting through the Special Claims Committee*

and

/s/ Luc A. Despins

PAUL HASTINGS LLP  
Luc A. Despins, Esq. (*Pro Hac Vice*)  
James R. Bliss, Esq. (*Pro Hac Vice*)  
James B. Worthington, Esq. (*Pro Hac Vice*)  
G. Alexander Bongartz, Esq. (*Pro Hac Vice*)  
200 Park Avenue  
New York, New York 10166  
Telephone: (212)318-6000  
lucdespins@paulhastings.com  
jamesbliss@paulhastings.com  
jamesworthington@paulhastings.com  
alexbongartz@paulhastings.com

*Counsel to Official Committee of Unsecured Creditors for  
all Title III Debtors (other than COFINA)*

- and -

/s/ Juan J. Casillas Ayala

CASILLAS, SANTIAGO & TORRES LLC  
Juan J. Casillas Ayala, Esq., USDC - PR 218312  
Diana M. Batlle-Barasorda, Esq., USDC - PR 213103  
Alberto J. E. Aneses Negrón, Esq., USDC - PR 302710  
Ericka C. Montull-Novoa, Esq., USDC - PR 230601  
El Caribe Office Building  
53 Palmeras Street, Ste. 1601  
San Juan, Puerto Rico 00901-2419  
Telephone: (787)523-3434  
jcasillas@cstlawpr.com  
dbatlle@cstlawpr.com  
aaneses@cstlawpr.com  
emontull@cstlawpr.com

*Local Counsel to Official Committee of Unsecured  
Creditors for all Title III Debtors (other than COFINA)*